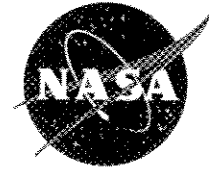


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



December 3, 2008

Reply to Attn of: General Law Practice Group

TO: Distribution

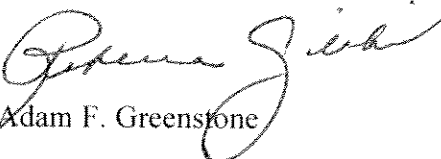
FROM: Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the  
44<sup>th</sup> Year-End Review & Forecast Luncheon on December 10, 2008

On December 10, 2008, the American Industries Association (AIA) will host a reception and luncheon at the Mayflower Hotel, Washington, D. C. The AIA will be releasing the latest business statistics on the aerospace and defense industry. NASA attendees will also have the opportunity to hear the industry forecast presented by AIA President and CEO Marion Blakely. NASA attendees will have the opportunity to talk with trade and national media reporters, industry communicators and other government public affairs officers.

The reception will be widely attended by Federal officials from other Government agencies, local government officials, representatives of industry, private individuals, members of Congress and their staffers. The sponsor has estimated cost of the reception, which includes all food and beverages to be \$80 per person and approximately 350 individuals have been invited to attend. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event. The reception will allow NASA employees the opportunity to discuss NASA's activities and the results thereof, with other guests.

NASA employees whose duties substantially affect AIA, a majority of all of its members, or the company or organization extending the invitation, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

  
for Adam F. Greenstone